

STATE OF SOUTH CAROLINA

(Caption of Case)

Petition of Crusader/Mountie, LLC for Approval of
the Sale and Transfer of its Sewer System Assets to
Renewable Water Resources

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2017 - - S

(Please type or print)

Submitted by: Belton T. Zeigler

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DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input checked="" type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input checked="" type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2017-__-S

In Re: Petition of Crusader/Mountie,)
LLC for Approval of the Sale and)
Transfer of its Sewer System Assets to)
Renewable Water Resources)
_____)

PETITION

Pursuant to S.C. Code Ann. Regs. 103-504, 103-541, and 103-825 (2012), Crusader/Mountie, LLC (“Crusader”) hereby petitions the Public Service Commission of South Carolina (the “Commission”) for an order approving the transfer and sale of its sewer assets to Renewable Water Resources (“ReWa”) pursuant to S.C. Code Ann. Reg. 103-504. In support of this Petition, Crusader would respectfully show to the Commission the following:

1. Crusader is a single member limited liability company organized under the laws of the State of South Carolina.
2. Legal counsel for Crusader in this proceeding is as follows:

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All correspondence and any other matters relative to this proceeding should be addressed to these representatives.

3. Crusader's sole member is the North Greenville University.
4. Crusader is a public utility within the meaning of S.C. Code Ann. § 58-5-10(4). Crusader operates a wastewater collection, treatment and disposal system ("Crusader System") certificated by the Public Service Commission.
5. Included in Crusader's authorized service area is the Greenville campus of North Greenville University as well as certain customers in the Cherokee Valley community. The Crusader System serves approximately 131 customer accounts.
6. Crusader acquired its sewer system in 2014 from United Utility Companies, Incorporated, the transfer of which was approved on May 27, 2014, in Commission Order No. 2014-437, Docket No. 2014-102-S.
7. Crusader currently provides service pursuant to rates approved by the Commission in Order No. 2014-437, issued May 27, 2014, in Docket No. 2014-102-S.
8. ReWa is a special purpose district and political subdivision organized under the laws of the State of South Carolina, which operates under the authorities granted by Act No. 362 of the Acts of the General Assembly of the State of South Carolina, 1925, as

amended, such amendments to include, without limitation, Act No. 195 of 1999 and Act No. 298 of 2016.

9. ReWa operates an extensive sewer system and service in Greenville County, South Carolina.

10. On May 31, 2017, Crusader and ReWa adopted the Agreement for the Transfer of Assets that is attached to this petition as Exhibit A, authorizing transfer of the Crusader System to ReWa for the sum of \$1.00, subject to approval of the transfer by this Commission.

11. Crusader respectfully requests the Commission to find that this transfer is in the interest of customers and the public and approve it for the reasons set forth below.

12. ReWa is an experienced, professional and financially well-capitalized utility operator that is fully capable of providing reliable and efficient service to customers in the Crusader territory:

- a. ReWa treats an average flow of 44 million gallons per day.
- b. ReWa's total revenues as of December 31, 2016 were \$46.0 million.
- c. ReWa's net capital assets for fiscal year 2016 were \$460.3 million.
- d. ReWa's operating expenses for depreciation as of December 31, 2016 were \$19.1 million.
- e. ReWa's debt coverage is 194%.
- f. ReWa has a seasoned and professional utility management team and is governed by an independent board of commissioners appointed by the Greenville County Legislative Delegation.

13. In adopting Act No. 298 of 2016, the South Carolina General Assembly expanded ReWa's authorized service boundaries to encompass the North Greenville area of Greenville County, which includes the Crusader service territory. It is Crusader's understanding that ReWa intends over time to expand its system and service in the North Greenville County area and to consolidate Crusader's System into this expanded system.

14. A copy of ReWa's current financial statement is attached hereto and incorporated herein by reference as Exhibit B.

15. Upon the transfer, ReWa intends to charge customers for wastewater services at the current Crusader rates. Rates will only be changed if and when the ReWa Board approves an adjustment in the future.

16. Crusader believes that ReWa has demonstrated the experience, operational resources and capitalization necessary to effectively operate the assets proposed to be transferred and serve the customers of the Crusader System.

17. As required by S.C. Code Ann. Reg. 103-504, Crusader has given notice of this petition to the South Carolina Department of Health and Environmental Control and other interested wastewater utilities.

REQUEST FOR RELIEF

WHEREFORE, Crusader respectfully requests the Commission to take the following action:

- A. Determine that pursuant to S.C. Code Ann. Reg. 103-504, the transfer of the system from Crusader to Renewable Water Resources is in the public interest, and that public convenience and necessity will be furthered by the transfer;

- B. Pursuant to S.C. Code Ann. Reg. 103-541, approve the transfer of the Crusader System to Renewable Water Resources pursuant to;
- C. Release Crusader from all obligations under prior Commission orders as of the effective date of the transfer; and
- D. Grant such other and further relief as this Commission deems just and proper.

Respectfully submitted,



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Attorneys for Crusader/Mountie, LLC

Columbia, South Carolina

Date: December 15, 2017

LIST OF EXHIBITS

EXHIBIT A – Agreement for the Transfer of Assets

EXHIBIT B – Renewable Water Resources' current financial statement

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2017-__-S

In Re: Petition of Crusader/Mountie, LLC)
for Approval of the Sale and Transfer of its)
Sewer System Assets to Renewable Water)
Resources)
_____)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one copy of the **Petition** to the persons
named below at the addresses set forth via U.S. First Class Mail and electronic mail:

Jeffrey M. Nelson , Counsel
Shannon Bowyer Hudson , Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201



December 15, 2017